

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

The Honorable Clifton B. Newman, Circuit Court Judge

---

Case No.: 2019-CP-40-04650

Appellate Case No.: 2023-001289

---

Tasha Jones; and Shaniqua Thompson.....Respondents,

v.

Lyndon Southern Insurance Company,.....Appellant.

---

DESIGNATION OF MATTER TO BE  
INCLUDED IN THE RECORD ON APPEAL

---

The Appellant designates the following materials to be included in the Record on Appeal with regard to the Initial Appellant's Brief:

**Civil Action No.: 2019CP-40-04650:**

1. Appellate Order of January 2, 2024.
2. Appellant's Return to Motion to Remand of October 9, 2023.
3. Respondent's Motion to Remand of August 21, 2023
4. Form 4 Order of March 27, 2024.
5. Order of March 27, 2024.
6. Memorandum in Support of Denying Post-Trial Motions.
7. Notice of Appeal.

8. Form 4 Order of July 14, 2023.
9. Lyndon Southern's Post-Trial Motion of July 3, 2023.
10. Plaintiffs' Trial Exhibits from June 21, 2023 – June 23, 2023 Jury Trial:
  - a. Plaintiffs' Exhibits No.(s): 1-26.
11. Lyndon Southern Letter to the Court dated and filed July 8, 2023.
12. Transcript of Proceedings pp: 3; 6-24; 38-39; 70-90; 108-127; 134-180; 192-263; 267-319; 322-323; 375-383.
13. Jury Verdict Form of June 23, 2023.
14. Appellant's Motion for Summary Judgment of June 8, 2023.
15. Affidavit of Tasha Jones of November 10, 2022.
16. Affidavit of Shaniqua Thompson of November 10, 2022.
17. Form 4 Order of May 19, 2022.
18. Form 4 Order of January 11, 2021.
19. Lyndon Southern's Answer to Amended Summons & Complaint of August 27, 2021.
20. Amended Summons and Complaint of March 19, 2021
21. Lyndon Southern's Answer to Summons & Complaint of October 2, 2021.
22. Amended Summons & Amended Complaint of August 23, 2021.
23. Claims Administration Agreement.
24. ALIR Document.
25. Lyndon Southern S.C. Policy.
26. CIS Agreement.

**Civil Action No.: 2018-CP-40-00337:**

23. Order of August 4, 2020.
24. Form 4 Order of July 24, 2020.
25. Lyndon Southern's Memorandum and Exhibits in Support of Rule 60(b) motion of July 21, 2020.
26. Plaintiffs' Memorandum and Exhibits in Support of Denying John Doe's Rule 60(b) motion of July 17, 2020.
27. John Doe's Rule 60(b) Motion for Relief From Judgment of June 18, 2020.
28. Plaintiffs' Demand Letter to Lyndon Southern of July 20, 2020.
29. Order of Judgment June 19, 2019.
30. Damages Hearing Transcript of June 6, 2019.
31. Email to Randy Helmly of June 5, 2019.
32. Form 4 Order of September 28, 2018.
33. Service of Process S.C. Department of Insurance dated January 25, 2018.
34. Summons and Complaint.

I certify that this designation does not include any matter that is irrelevant to the issues on appeal.

October 1, 2024.

*s/ Dietrich A. Lake*

---

Dietrich A. Lake (S.C. Bar No.: 69649)  
The Lake Law Firm  
1004 Calhoun Street  
Columbia, SC 29201  
803-750-8311 office  
803-750-8312 fax  
[dietch@thelakelawfirm.org](mailto:dietch@thelakelawfirm.org)  
Attorney for Respondents